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GOOGLE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**DECLARATION OF THILINI  
CHANDRASEKERA IN SUPPORT OF GOOGLE  
LLC'S OBJECTIONS TO PLAINTIFFS'  
OPENING DEMONSTRATIVES REGARDING  
DAMAGES; GOOGLE'S RELATED MOTION  
IN LIMINE No. 15 TO EXCLUDE EVIDENCE  
OF UNTIMELY ALTERNATIVE UNJUST  
ENRICHMENT CALCULATIONS**

Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 I, Thilini Chandrasekera, hereby declare as follows:

2 1. I am an associate with the law firm Cooley LLP and am counsel for Defendant  
3 Google LLC in the above captioned action. I am duly licensed to practice law in the state of  
4 California and am admitted to practice before this Court. The matters set forth herein are of my  
5 own personal knowledge, and if called as a witness to testify, I could and would testify to these  
6 matters. I submit this declaration in support of Google's Objections to Plaintiffs' Opening  
7 Demonstratives Regarding Damages; Related Motion *in Limine* No. 15 to Exclude Evidence of  
8 Untimely Alternative Unjust Enrichment Calculations, filed concurrently herewith.

9 2. On April 25, 2025, Mr. Lasinski served a second supplemental expert report  
10 omitting his new model for actual damages. Attached hereto as **Exhibit A** is a true and correct of  
11 the report and excerpts of the accompanying supplemental schedules attached to the report.

12 3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the  
13 transcript of the pretrial conference held in this action on July 30, 2025.

14 4. Between August 1, 2025, and August 16, 2025, the parties engaged in extensive and  
15 detailed back-and-forth over Mr. Lasinski's new opinion in his second supplemental report and  
16 Plaintiffs' argument that Dr. Knittel had disclosed impermissible opinions in a supplemental report,  
17 too. As of August 4, 2025, the parties had each agreed to the same three compromise points,  
18 including that "Lasinski will not testify that damages/unjust enrichment should be the figures  
19 identified in SS1.1-II." These negotiations ultimately fell apart, and Plaintiffs now refuse to  
20 withdraw Mr. Lasinski's newly disclosed footnote damages calculation. Attached hereto as  
21 **Exhibit C** is a true and correct copy of the parties' meet and confer communications.

22 5. On August 17, 2025, the parties exchanged demonstratives for their opening  
23 presentations. Attached hereto as **Exhibit D** is a true and correct copy of excerpts of Plaintiffs'  
24 demonstratives.

25 I declare under penalty of perjury under the laws of the State of California and the United  
26 States of America that the forgoing is true and correct.

Executed on August 17, 2025 at San Francisco, California.

/s/ Thilini Chandrasekera  
Thilini Chandrasekera